



**Wireless Internet
Service Provider**

April 1, 2011

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of Connect America Fund,
A National Broadband Plan for Our Future
Establishing Just and Reasonable Rates for Local
Exchange Carriers High-Cost Universal Service Support
Developing an Unified Intercarrier Compensation
Regime Federal-State Joint Board on Universal Service
Lifeline and Link-Up

WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135
WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45
WC Docket No. 03-109

Dear Ms. Dortch:

My company, St. Louis Broadband, LLC, is a Wireless Internet Service Provider (WISP); which provides fixed wireless broadband service in the metro St. Louis area. We rely primarily on unlicensed spectrum to deliver broadband services to consumers and mainly business which have few broadband options. We built our network using devices authorized predominately under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices. We just started using the 3.65 GHz "Licensed-Lite" spectrum and are very excited with the results.

FCC 11-13 – Paragraph 5

"The unserved include the family in Alachua County, Florida whose daughter routinely drives to a vacant public library parking lot at night to use the WiFi connection to download her high school homework, because her family cannot get broadband at home. They include the family in Montgomery County, Ohio who is frustrated that they cannot get broadband from their local telephone company, even though broadband is available two miles away in the town of Brookville...."

Unserved areas also include entire counties in the Missouri Ozarks. To compound problems these counties are also without 21st Century First Responder networks and the majority of these areas are deemed persistent poverty counties. These areas are especially worrisome because they are within the New Madrid Fault Zone, and are at extreme risk.

I believe that Fixed Wireless Broadband solutions cannot only address the issues of lack of county wide broadband, but become a First Responder solution, as well.

The current network infrastructure must move into the future of IP-based networks. The majority of American's copper infrastructure is now becoming legacy technology. The common business class circuit -- T1, is now outdated as the new definition of broadband has been defined. We must move from that model as we did from dial-up to DSL/Cable/Wireless, a convergence of technologies must take place.

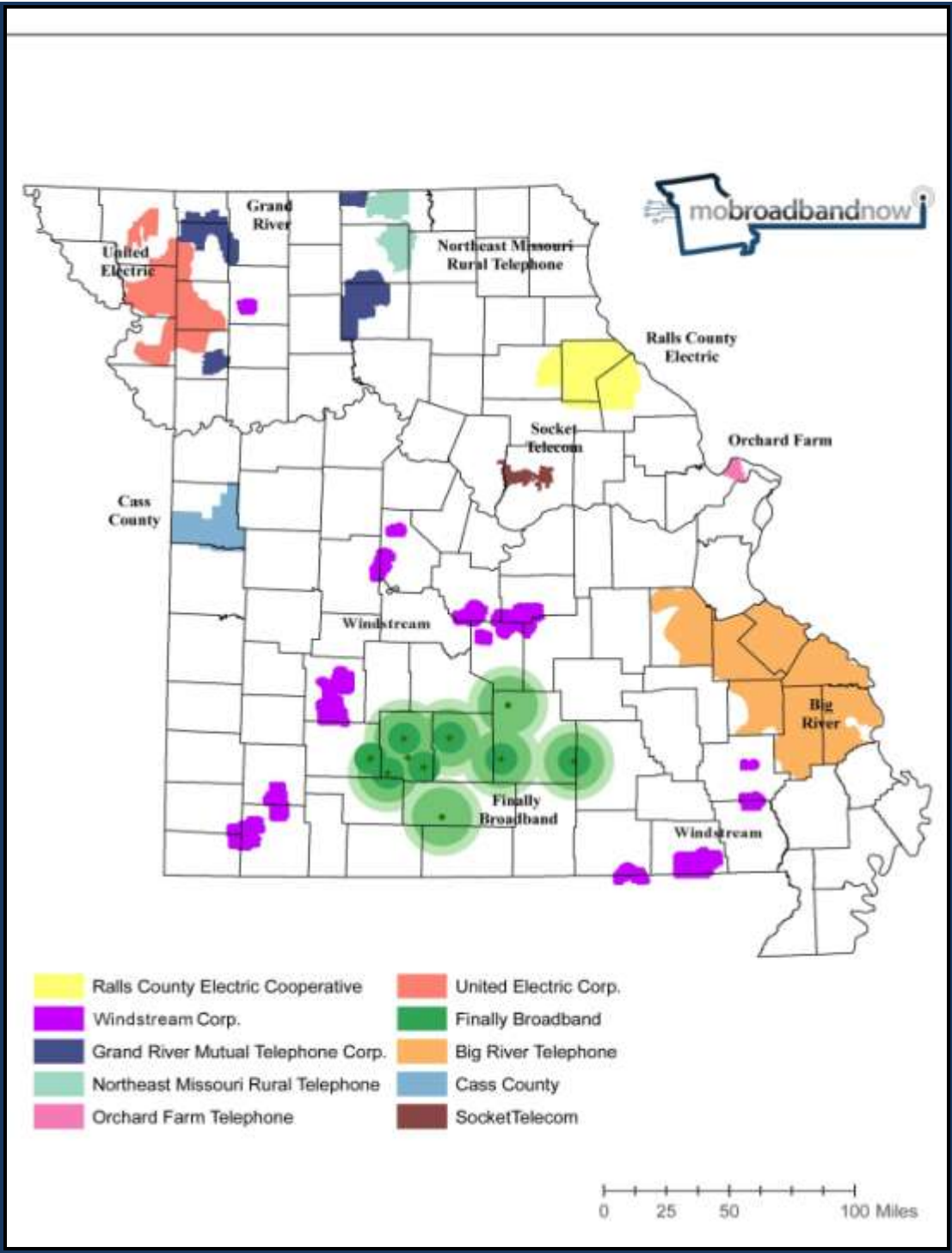
America is the inventor of the Internet and information technology. We must not allow ourselves to become second class to any nation, in this industry. The USF has been abused and misused over past decade, it is now outdated and not in sync with current technological standards, it is a financial burden to our citizens, and it must be reformed.

The USF must 'multi-task' and not only provide necessary support to low income families, rural and tribal areas, but it must also help in the building of the Nations' First Responder infrastructure. The fiscally responsible infrastructure would be multi-purposed. It would include, a First Responder network, rural broadband access; and tower collocation for mobile networks.

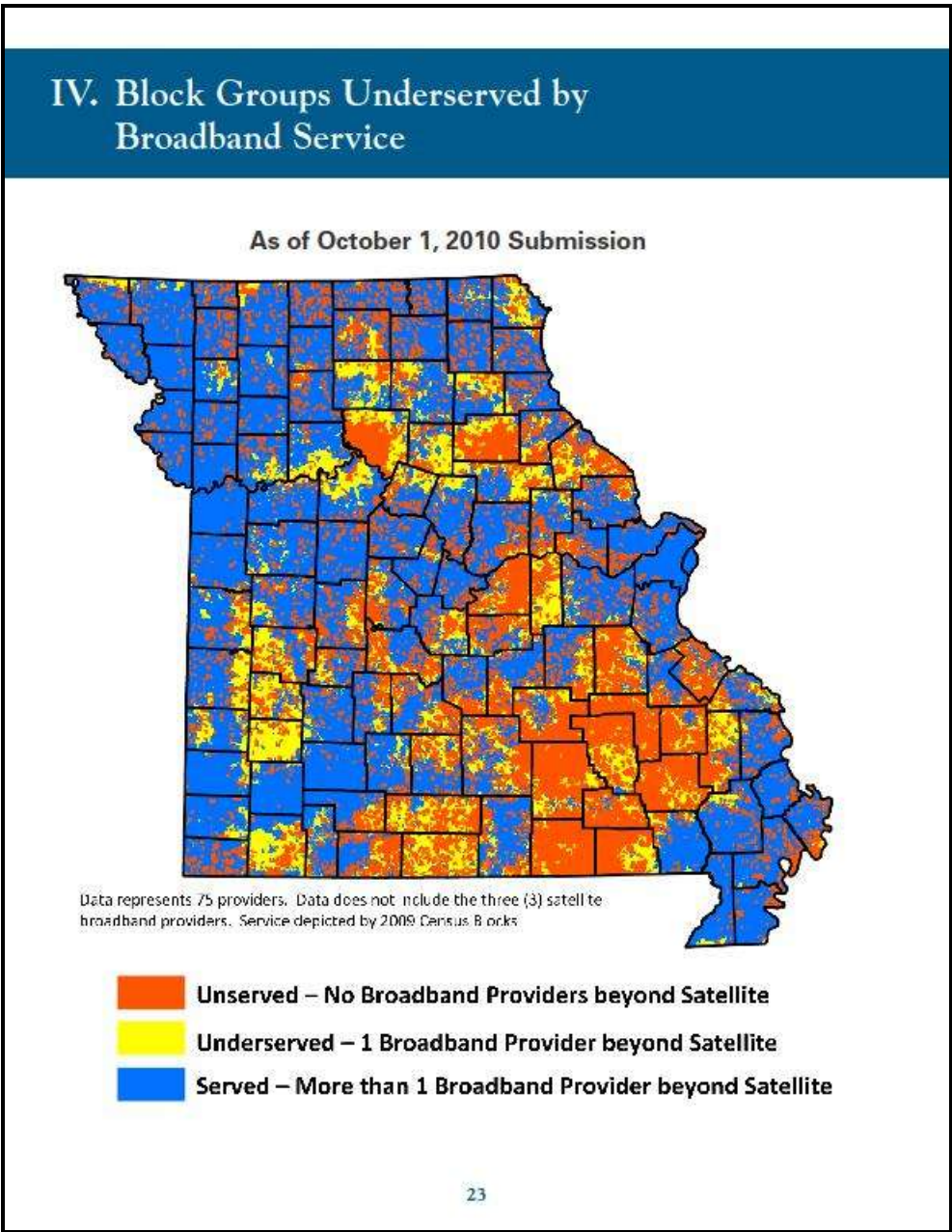
With this financially responsible build-out in mind, this would ultimately address these timely problems and would provide a fiscally responsible solution for our citizens.

In the state of Missouri, the broadband stimulus appears to have failed in many ways. I believe this was due to the fact that "the cart was before the horse..." figuratively speaking. The broadband map unveiled unserved areas of Missouri that were not funded, verse served areas that were funded.

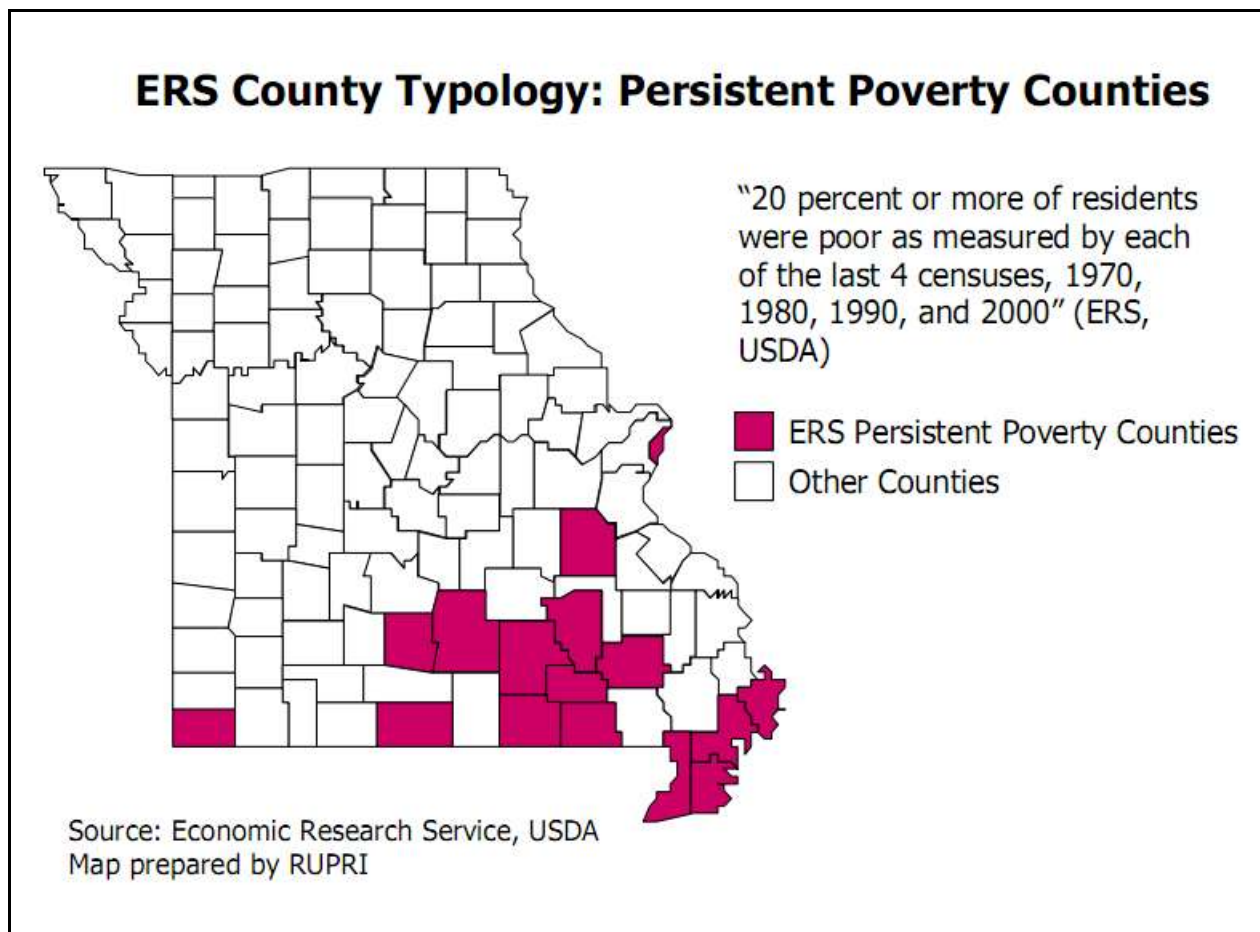
Broadband Stimulus Awards for the Missouri Project – MOBroadbandNow!



State of Missouri Broadband Mapping:



Some of the poorest, rural and totally unserved areas in the Missouri Ozarks were totally over looked by the broadband stimulus.



Counties such as Iron, Dent, Reynolds, Oregon, Ripley and Carter received no funding at all. Shannon County, a persistent poverty county received a small amount for a wireless network, which we believe maybe underfunded. These counties are also without a proper Public Safety network.

Now, with access to the broadband map we have a better target for funding the infrastructure of needed areas. Fixed Wireless Broadband is a technology that is easily deployed. Because the Wireless Internet Service Provider (WISP) uses various FCC Part-15 regulated spectrum, there is not the costly and un-returnable build-out associated with other technologies. Our field test in urban areas with 3.65 "Licensed-Lite" spectrum has given us encouraging results at 20 Meg downloads and 10 Meg uploads.

The FCC is now granting experimental license for the TV Whitespace, field tests are encouraging for rural development, with speeds above the threshold for broadband as well as, we are seeing extended distances from access points in challenging terrains.

It is important to look to the WISP that has been targeting the rural market for the last decade, while the 'big guys' have chosen to ignore these citizens.

WISP networks are inherently fiscally responsible and bring more "bang for the buck" to the table. Rather than deploying Fiber to the Home mentality (FTTH) and encumber more national debt, and serve the few; let the WISP build it today, at reasonable costs and serve the many.

USF reform monies going to public, private and or public/private partnerships should include community services. Let our communities benefit! Community services would consist of no less than wholesale services to schools, libraries, First Responders, hospitals, and low income families and businesses.

It is important that these projects be community based, rather than state based. Community based insures that the needs of the communities are met at a local level. It is important to place private/public partnerships as a priority for funding. Clearly the state's have other goals that do not coincide with the expansion of rural broadband in the poorer areas of America, where we need it most.

While there are clearly more issues to address, such as the ICC relationship in regards to the USF reform, we believe it is important that the FCC recognize the original intent of the USF, which was to deploy rural telephone services and to support economically challenged areas.

Thank you for your consideration.

Respectfully,

/s/ Victoria Proffer
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